

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

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DR. ROBERT LEDERER,
Plaintiff,

v.

JOHN SNOW, INC. and
THE JOHN HOPKINS UNIVERSITY/
CENTER FOR COMMUNICATION
PROGRAM,
Defendants.

* * * * *

CIVIL ACTION NO.
04-10284-NG

**JOHN HOPKINS UNIVERSITY/CENTER FOR COMMUNICATION PROGRAM'S
STATEMENT PURSUANT TO COURT ORDER OF OCTOBER 26, 2004**

In conformance with this Court's Order of October 26, 2004, counsel for John Hopkins University/Center for Communication Program (hereinafter "the defendant"), attempted to coordinate a Joint Statement as ordered by the Court. Counsel was unsuccessful in this attempt, and therefore is submitting this individual statement in an effort to provide the Court with the requested information.

A. STATUS OF THE CASE

The defendant submitted its automatic document disclosure pursuant to Local Rule 26.2 (A). The defendants recently received the plaintiff's Local Rule 26.2(A) document disclosure from the plaintiff. The plaintiff's deposition commenced, but is not yet complete. Despite numerous inquiries, the defendant has not been provided a date(s) to complete his deposition. The defendant has served written discovery to the plaintiff, for which the plaintiff's responses are long overdue. The Defendant has requested a discovery conference in this regard pursuant to Local Rule 37.1. The defendant received no response from the plaintiff.

B. REMAINING PRETRIAL SCHEDULING

The defendant would respectfully ask the Court to set a date for the plaintiff to comply with outstanding discovery and set a date for dispositive motions to be filed and heard.

C. ALTERNATIVE DISPUTE RESOLUTION

The defendant does not believe ADR is an option for this matter.

D. TRIAL

The defendant consents to the trial of this case before Magistrate Judge Judith Gail Dein.

**Johns Hopkins University/
Center for Communication Programs,
By their attorney,**

/s/ John F. Rooney, III

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Dated: January 27, 2005.